FILED

UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF TENNESSEE 2025 JUN - 2 PM 12: 37 NORTHEASTERN DIVISION U.S. DISTRICT COURT

	A A CONTRACTOR
JESSE DANIEL ROBARDS, Fother Tamara hashed Robards Plaintiffs, Mother v.)))))))) NO.224 ev 00032
RONALD THURMAN,)
Defendants,)))

COMPLAINT FOR DAMAGES AND INJUNCTIVE RELIEF

INTRODUCTION

1. This is a civil action brought by Plaintiff Jesse Robards against Defendant Ronald Thurman, a judge in the 13th District Chancery Court, for violations of Plaintiff's constitutional rights under color of law, pursuant to 42 USCS 1983. Plaintiff seeks damages and injunctive relief to prevent the unlawful consolidation of separate parental termination proceedings, which violates Tennessee law and Plaintiff's rights to due process and fair adjudication.

JURISDICTION AND VENUE

- 2. This Court has jurisdiction over this action pursuant to 28 USCS 1343 and (4), as this case arises under federal law to redress the deprivation of Plaintiff's constitutional rights under color of state law.
- 3. Venue is proper in this Court under 28 U.S.C. § 1391(b), as the events giving rise to this action occurred in the Middle District of Tennessee.

PARTIES

- 4. Plaintiff Jesse Robards is a resident of Tennessee and the biological parent of two children who are the subject of ongoing parental termination proceedings in the 13th District Chancery Court.
- 5. Defendant Ronald Thurman is a judge in the 13th District Chancery Court, acting under color of state law. Defendant is sued in his individual capacity for damages and in his official capacity for injunctive relief.

FACTUAL ALLEGATIONS

- 6. Plaintiff is currently involved in parental termination proceedings in the 13th District Chancery Court, case number 2025-cv-87, concerning his two remaining children.
- 7. Judge Caroline Knight facilitated the removal of the original judge, Judge Ridley, and appointed Defendant Thurman to preside over Plaintiff's case.
- 8. Defendant Thurman, known colloquially as "The Terminator" for his reputation of terminating parental rights without adequate review, has unlawfully consolidated separate termination cases involving Plaintiff's children.
- 9. The consolidation was done to provide foster parents in one termination case access to privileged information about the child in the other case, in violation of Tennessee law and Plaintiff's constitutional rights.
- 10. Defendant's actions under color of law have deprived Plaintiff of his rights to due process and fair adjudication, as guaranteed by the Fourteenth Amendment to the United States Constitution.
- 11. Defendant's actions are not protected by judicial immunity because they were taken in clear violation of Tennessee law and exceeded the scope of his judicial authority.

CAUSES OF ACTION

Count I: Violation of 42 U.S.C. § 1983 – Deprivation of Due Process Rights

- 12. Plaintiff incorporates by reference all preceding paragraphs as if fully set forth herein.
- 13. Defendant, acting under color of state law, has deprived Plaintiff of his constitutional right to due process by unlawfully consolidating separate termination cases, thereby prejudicing Plaintiff's ability to fairly defend his parental rights.
- 14. Defendant's actions have caused Plaintiff significant harm, including emotional distress, reputational damage, and the risk of losing his parental rights without a fair hearing.

Count II: Injunctive Relief

- 15. Plaintiff incorporates by reference all preceding paragraphs as if fully set forth herein.
- 16. Plaintiff seeks an injunction to prevent Defendant from consolidating the separate termination cases, as such consolidation violates Tennessee law and Plaintiff's constitutional rights.
- 17. Plaintiff has no adequate remedy at law and will suffer irreparable harm if the consolidation is not enjoined.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that this Court:

- a. Enter judgment in favor of Plaintiff and against Defendant;
- b. Award Plaintiff compensatory damages in an amount to be determined at trial;
- c. Issue a preliminary and permanent injunction preventing Defendant from consolidating Plaintiff's separate termination cases;

- d. Award Plaintiff reasonable attorney's fees and costs pursuant to 42 U.S.C. § 1988; and
- e. Grant such other and further relief as the Court deems just and proper.

Tamara Robands

Respectfully Submitted,

/s/ Jesse Daniel Robards Jesse Daniel Robards 510 Countrywood Ln Gainesboro, Tennessee 38562 865-315-2507

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